in intangible property rights. *Laird Bell* v. *Carter H. Harrison* (1954) 212 F. 2d 253; *Clara Hellman Heller Trust et al.* v. *Commissioner of Internal Revenue* (1946) 7 T. C. 556; *Henry B. Miller* (1928) 10 B. T. A. 383.

CONCLUSION

For the reasons stated, the decision of the court below should be reversed with respect to the issues before this Court and the amount of $1,440,000 be allowed as a deduction in 1945 or, alternatively, amortized and allowed as deductions over the 21-year period of the extinguished lease.

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